

## **Continuation of Application for Arrest Warrant**

I, Jon Schafer, being duly sworn, hereby depose and state as follows:

### **I. INTRODUCTION**

1. I am a Task Force Officer with the Drug Enforcement Administration (“DEA”). I have been so assigned since approximately 2014. As part of my duties as a DEA Task Force Officer, I investigate criminal violations of the federal drug trafficking laws. I have been involved with various electronic surveillance methods, the debriefing of defendants, informants, and witnesses, as well as others who have knowledge of the distribution, transportation, storage, and importation of controlled substances. I have received training in the area of drug investigations, money laundering, financial investigations, and various methods which drug dealers use in an effort to conceal and launder the proceeds of their illicit drug trafficking enterprises. I have participated in investigations that have led to the issuance of search warrants involving violations of drug laws. These warrants involved the search of locations including: residences of targets, their associates, and relatives; storage facilities; smartphones; and computers. Evidence searched for, and recovered, in these locations has included controlled substances, records pertaining to the expenditures and profits realized therefrom, monetary instruments, and various assets that were purchased with the proceeds of the drug trafficking.

2. I have received training in the area of narcotics investigations, money laundering, financial investigations, and various methods, which drug dealers use in

an effort to conceal and launder the proceeds of their illicit drug-trafficking enterprises. I have participated in numerous investigations involving violations of narcotics laws.

3. This continuation is based on a DEA Grand Rapids (Grand Rapids District Office or “GRDO”), DEA Detroit, Kent Area Narcotics Enforcement Team (“KANET”), IRS Criminal Investigation Grand Rapids and Grand Rapids Police Department (“GRPD”) investigation.

4. This continuation is submitted for the purpose of obtaining an arrest warrant for JAMES ALLEN MORE for possession with intent to distribute 28 grams or more of cocaine base and 100 grams or more of heroin, in violation of Title 21, United States Code Sections 841(a)(1) and (b)(1)(B), and possession with intent to distribute cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

5. MOORE was previously convicted of distribution of 5 grams or more of cocaine base, in violation of Title 21, United States Code Section 841(a)(1), in 2008. He was sentenced to 70 months’ incarceration with the Bureau of Prisons, followed by three years of supervised release. On January 11, 2012, MOORE’s supervised release was revoked and MOORE was sentenced to incarceration in the Federal Bureau of Prisons until June 28, 2018. This qualifies as a serious drug felony, as defined by 21 U.S.C. § 802(57) and used in 21 U.S.C. § 841(b)(1)(B), as well as a prior felony drug offense, as defined by 21 U.S.C. § 902(44) and used in 21 U.S.C.

§ 841(b)(1)(C).

6. This continuation contains only a summary of relevant facts for the requested arrest warrant. I have not included each and every fact known to me concerning the entities, individuals, and events described in this continuation.

## **II. PROBABLE CAUSE**

7. On December 1, 2020, investigators executed search warrants at two locations associated with MOORE - 100 Burton Street, Apt #306, Grand Rapids, Michigan (1:20-mj-490) and the Muffler Man, 1246 Plainfield Ave NE, Grand Rapids, Michigan (1:20-mj-491).

8. 100 Burton, Apartment #306 is MOORE's known residence. Investigators have surveilled MOORE coming and going from frequently over the course of the investigation.

9. The Muffler Man is an automotive repair business owned and operated by MOORE.

10. When investigators entered 100 Burton St SE, Apt #306, JAMES MOORE and two other people were present. Apartment #306 is a two-bedroom apartment. Investigators identified the west bedroom as belonging to MOORE because he was sleeping in it when police arrived. After waiving his *Miranda* rights, MOORE told investigators that the other two people present did not live there. Additionally, investigators found paperwork for the Muffler Man inside the apartment.

11. Investigators located the following items in 100 Burton St SE, Apt #306:

- a. 53 grams of a substance that field-tested positive as cocaine base, located in a kitchen cabinet to the left of the stove;
- b. A plate and razor with cocaine residue, located in a kitchen cabinet to the left of the stove,
- c. A digital scale, located in a kitchen cabinet to the left of the stove;
- d. 142 grams of a substance that field-tested positive as heroin, located in a kitchen cabinet;
- e. A digital scale in a kitchen drawer.

12. When investigators entered the Muffler Man at approximately 6:00 am, the business was closed and no one was present. There was paperwork in the office with MOORE's name on it.

13. Investigators located the following items inside the Muffler Man:

- a. 88.9 grams of a substance that field-tested positive as cocaine, located underneath the front counter;
- b. A digital scale and a box of sandwich baggies, located in the office; and
- c. A spoon containing cocaine residue, located in the office.

14. In my training and experience, the quantity of drugs found in 100 Burton St SE, Apt #306 and the Muffler Man, in combination with the digital scales often used to weigh controlled substances for sale, suggest that the drugs were intended for distribution.

### **III. CONCLUSION**

15. Based on the forgoing information, I submit there is probable cause to believe that JAMES MOORE possessed with intent to distribute 28 grams or more of cocaine base and 100 grams or more of heroin, in violation of Title 21, United States Code Sections 841(a)(1) and (b)(1)(B), and possessed with intent to distribute cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).